

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

RICHARD DASCHBACH and ELCINDA  
PERSON, individually and on behalf of all  
others similarly situated,

Plaintiffs,

v.

ADVANCED MARKETING &  
PROCESSING, INC. d/b/a PROTECT MY  
CAR, a Florida corporation,

Defendant.

Case No. 1:20-cv-00706-JL

**CLASS ACTION**

**JURY DEMANDED**

**ASSENTED-TO MOTION FOR EXTENSION OF TIME FOR PLAINTIFF  
TO RESPOND TO DEFENDANT’S MOTION TO COMPEL ARBITRATION  
AND DISMISS COMPLAINT**

Pursuant to Fed. R. Civ. P. 6(b)(1)(A), Plaintiffs Richard Daschbach (“Daschbach”) and Elcinda Person (“Person”) (collectively “Plaintiffs”) move this Court for the entry of an Order granting an extension of time to respond to Defendant Advanced Marketing & Processing, Inc. d/b/a Protect My Car (“Defendant” or “PMC”) Motion to Compel Arbitration and to Dismiss Complaint, or, Alternatively, to Dismiss the Complaint for Lack of Personal Jurisdiction (dkt. 12) [hereafter “Motion to Compel and Dismiss”] to **September 29, 2020**. Plaintiffs further state as follows:

1. On June 15, 2020, Plaintiffs filed the Complaint against PMC.
2. On September 1, 2020, Defendant filed its Motion to Compel and Dismiss.
3. The objection in response to PMC’s Motion is due on September 15, 2020.

4. Plaintiffs' counsel is in need of additional time to evaluate the arguments supporting the motion, discuss those arguments with Plaintiffs, and formulate appropriate and thorough responses to the motion.

5. Good cause exists for this request, and a brief, two-week extension of time until September 29, 2020, would not cause prejudice to Defendant or the Court.

6. This extension is not sought for dilatory reasons or any other improper purpose, and Plaintiffs have not previously sought an extension to the same effect.

7. The requested extension would not result in the continuance of any hearing, conference, or trial.

8. No memorandum of law is filed in support of this motion because the relief sought is within the discretion of the Court.

9. Counsel for Defendant was contacted by email to confer in good faith in an effort to obtain concurrence to the relief sought by this Motion, and counsel for Defendant agreed to the extension sought herein.

WHEREFORE, Plaintiffs Daschbach and Person respectfully request that this Honorable Court:

A. Enter an order granting an extension of time for Plaintiffs to respond to Defendant's Motion to Compel and Dismiss, to September 29, 2020; and

B. Grant such other and further relief the Court deems necessary and just.

DATED: September 8, 2020

Respectfully submitted,

By: /s/ V. Richards Ward, Jr., Esq.  
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*Attorneys for Plaintiffs*

*\*Pro Hac Vice*

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above titled document was served upon counsel of record by filing such papers via Court's ECF system on September 8, 2020.

/s/ V. Richards Ward, Jr., Esq.